REMARKS

Applicants would like to thank the Examiner for careful consideration of the pending application.

Claims 13-32 are pending in the application. Independent Claim 13 has been amended. New Claims 14-32 have been added. Support for all amendments can be found in the specification as originally filed. No new matter has been added.

Rejections under 35 USC 102 and 103

Claim 13 stands rejected under 35 USC 102(b) as being anticipated by or, in the alternative, under 35 USC 103(a) as obvious over US Patent No. 4,964,875 to Hendricks et al. (hereinafter referred to as "Hendricks").

It is well settled that in order for a prior art reference to anticipate a claim, the reference must disclose each and every element of the claim with sufficient clarity to prove its existence in prior art. The disclosure requirement under 35 USC 102 presupposes knowledge of one skilled in art of claimed invention, but such presumed knowledge does not grant license to read into prior art reference teachings that are not there. See *Motorola Inc. v. Interdigital Technology Corp.* 43 USPQ2d 1481 (1997 CAFC).

It is also well settled that to establish a *prima facie* case of obviousness, the USPTO must satisfy all of the following requirements. First, the prior art relied upon, coupled with the knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or to combine references. *In re Fine*, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). Second, the proposed modification must have had a reasonable expectation of success, as determined from the vantage point of one of ordinary skill in the art at the time the invention was made. *Amgen v. Chugai Pharmaceutical Co.* 18 USPQ 2d 1016, 1023 (Fed Cir, 1991), *cert. denied* 502 U.S. 856 (1991). Third, the prior art reference or combination of references must teach or suggest all of the limitations of the claims. *In re Wilson*, 165 USPQ 494, 496, (CCPA 1970).

Hendricks teaches wool that has been treated with polyurethane containing quaternary ammonium groups which is a cationic polyurethane.

The Examiner suggests that the wool treated as in Hendricks and the wool described in Independent Claim 13 are essentially the same and therefore, the subject matter would have been obvious to one skilled in the art because the patentability of the product does not depend from the method with which it is produced.

Applicants respectfully disagree. The wool described in amended independent Claim 13 has fibers that are distinct from the fibers disclosed in Hendricks. In particular, the wool of the present claimed invention has been oxidized on its surface by treatment with plasma. Oxidation causes the formation of hydroxyl, and keto functional groups and, in some cases when sulfur containing proteins are present on the wool surface, sulphonic acid groups on the surface of the wool fibers. These anionic charges on the wool surface lead to an improved coating efficiency and strength and a smoothening of the fiber surface when the cationic polyurethanes are used to coat the fibers. Hendricks clearly does not teach or suggest a non-felting wool with anionically charged fibers, and therefore, fails to teach or suggest each and every limitation of amended independent Claim 13.

Furthermore, the surface of wool fibers treated by the process of Hendricks would be different from the wool treated by the present claimed invention. Wool treated by the process of Hendricks as described in column 5, lines 5-8 is preferably dyed and can be unchlorinated, chlorinated or wool with a 'non-felting finish'. Column 5, lines 5-8 of Hendricks further states that good finishes are "obtained in the after treatment of dyeings on chlorinated wool or wool which has been given a non-felting finish..." Clearly, one skilled in the art would understand that chlorinating wool not only causes the removal of the cuticle of the wool fibers, but also strips the fibers of their proteinous protective layer and substantially damages the fibers. Therefore, the wool used in the process of Hendricks is clearly different than the wool used in the present claimed invention where the cuticle of the wool remains substantially intact when the surface of the fibers are oxidized with plasma treatment.

Accordingly, Hendricks fails to teach or suggest all of the limitations of amended independent Claim 13, and the wool used in the process of Hendricks has fibers whose surface is different from that of the present claimed invention. Therefore, Hendricks

does not anticipate amended independent Claim 13 under 35 USC 102(a) nor does Hendricks render obvious the subject matter of amended independent Claim 13 under 35 USC 103(a). Reconsideration of the Examiner's rejection is respectfully requested.

Claims 14-32 have been added and are considered allowable for at least the same reasons in connection with amended independent Claim 13.

In view of the above amendments and remarks, Applicants believe the pending application is in condition for allowance. Reconsideration and allowance are respectfully requested.

Respectfully submitted,

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